

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 03-10234-MLW
)	
v.)	
)	
JOSHUA GOLDSMITH, <i>et al.</i> ,)	
Defendant.)	
)	

**DEFENDANT JOSHUA GOLDSMITH'S SUPPLEMENTAL
MOTION TO SUPPRESS EVIDENCE**

Now comes the Defendant, Joshua Goldsmith, and hereby submits this supplemental motion to suppress evidence. As grounds therefore, the Defendant states the following:

1. The Defendant has a very solid basis for standing to contest the search and seizure of the package because he was the sender of the package.
2. Additionally, he has standing to contest the search and seizure of the package because he provided a valid driver's license with his picture and correct identifying information to Old Dominion at the time he delivered the package to the company. See generally Defendant Goldsmith's Memorandum in Support of his Motion to Suppress Evidence.
3. The search and seizure violated the Fourth Amendment as outlined in Defendant Gillies' Memorandum in Support of his Motion to Suppress Evidence, which Defendant Goldsmith hereby joins.
1. The search and seizure violated Federal Rule of Criminal Procedure 41 as outlined in Defendant Gillies' Memorandum in Support of his Motion to Suppress Evidence.

Wherefore, the Defendant respectfully requests that this Court suppress the contents of the package and all the fruits that flow therefrom. The Defendant also requests an evidentiary hearing to resolve the disputes of fact addressed in his memorandum as well those addressed by Defendant Gillies.

Respectfully Submitted By,
Joshua Goldsmith,
By His Attorney,

//S//Stephen Hrones
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CERTIFICATE OF SERVICE

I, Stephen Hrones, hereby certify that, on this the 12th day of October, 2005, I have caused to be served a copy of this document where unable to do so electronically, by first-class mail, postage prepaid, to all counsel of record in this matter.

//S//Stephen Hrones
Stephen Hrones